

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A  
LIMESTONE COLLEGE, COLLINS MURPHY,  
MG FREESITES, LTD., D/B/A  
PORNHUB.COM, and HAMMY MEDIA LTD.  
d/b/a XHAMSTER.COM,

Defendants.

CASE NO.: 7:21-cv-03193-DCC

**CONSENT MOTION IN SUPPORT  
OF *PRO HAC VICE* ADMISSION**

The undersigned local counsel hereby moves, together with the Application and Affidavit attached as Exhibit A, that Marissa Lewis of the law firm Mitchell Silberberg & Knupp LLP be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and

4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.

5. Certification of Consultation (Local Civil Rule 7.02).

☒ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☒ does not intend to oppose

☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

☐ No duty of consultation is required because the opposing party is proceeding pro se.

Respectfully submitted,

DATED February 23, 2024

Columbia, South Carolina

TURNER, PADGET, GRAHAM AND LANEY,  
P.A.

By: /s/ Mark B. Goddard

Mark B. Goddard | Attorney ID: 09194  
email mgoddard@turnerpadget.com  
direct | 803-227-4334

J. Kenneth Carter | Attorney ID: 05108  
email | kcarter@turnerpadget.com  
direct | 864-552-4611

Post Office Box 1473  
Columbia, South Carolina 29202  
facsimile | 803-400-1542

*Attorneys for Defendant MG Freesites Ltd.*